



Department of Energy

Brookhaven Site Office

P.O. Box 5000

Upton, New York 11973

MAR 08 2019

Ms. Sharon Hartzell
Federal Facilities Section
U.S. EPA - Region II
290 Broadway - 18th Floor
New York, New York 10007-1866

Mr. Brian Jankauskas
New York State Department of
Environmental Conservation
Division of Environmental Remediation
625 Broadway -12th Floor
Albany, New York 12233

Dear Ms. Hartzell and Mr. Jankauskas:

SUBJECT: BROOKHAVEN NATIONAL LABORATORY (BNL) INTERAGENCY
AGREEMENT (IAG) DRAFT ANNUAL SCHEDULES UPDATE/REPORT

Reference: Letter from B. Jankauskas, NYSDEC, to R. Gordon, SC-BHSO, Subject:
Brookhaven National Laboratory (Site ID: 152009), dated January 16, 2019

Attached please find responses to comments received in the above referenced letter. The draft Annual Schedules Update/Report will be finalized after the United States Environmental Protection Agency has completed their review.

If you have any questions please contact Jerry Granzen, of my staff, at (631) 344-4089.

Sincerely,

A handwritten signature in black ink, appearing to read "R. P. Gordon", is written over a horizontal line.

Robert P. Gordon
Site Manager

Attachment:
BNL Response to Comments

cc: J. Swartwout, NYSDEC
T. Papura, NYSDEC
D. O'Hehir, NYSDOH
J. Collins, NYSDOH
S. Karpinski, NYSDOH
A. Juchatz, SCDHS

A. Rapiejko, SCDHS
G. Granzen, SC-BHSO
S. Coleman, BSA
W. Dorsch, BSA
R. Howe, BSA
J. Remien, BSA

BNL Groundwater Protection Group
Responses to NYSDEC Comments on Annual Schedules Update/Report for Site Removal and Remedial Actions, dated November 2018

Comment Number	Section	Comment	Response
Letter from Brian Jankauskas, NYSDEC to Robert Gordon, BHSO, January 16, 2019.			
NA	General Comment	The State is requiring that BNL conduct the necessary survey to confirm the estimated 97 private wells and work with SCDHS to obtain drinking water samples to determine if site-related contamination is present above the Environmental Protection Agency's Health Advisory Level. BNL should be prepared to perform appropriate actions to reduce exposure to site-related contamination within a private well.	Brookhaven Science Associates (BSA) is working with the County and State regarding the request for BNL to pay for analyzing water samples for PFAS from 97 private wells that may exist south of the Laboratory. We will continue to keep the State apprised of progress and the final resolution.
1	Section 3.2, OU III, Page 19, first and second bullets	These bullets discuss 1,4-dioxane and per-polyfluoroalkyl substances (PFAS) contamination. The combined PFOA and PFOS detections are above the EPA Health Advisory Level of 70 ppt at multiple Areas of Concern (AOC) at the facility. A new Operable Unit should be established to cover 1,4 dioxane and PFAS contamination with the individual AOCs identified. The discussion and tables should be revised to include this OU and AOCs.	BNL is continuing to proactively characterize the extent of PFAS in the groundwater at the Laboratory via the installation of temporary wells and the sampling of existing monitoring wells. Following the promulgation of drinking water standards by the State for PFAS (PFOA, PFOS) and 1,4-dioxane, BNL will submit a recommendation to EPA and NYSDEC for the inclusion of new Areas of Concern under a new or existing Operable Unit to the BNL IAG.
2	Section 3.2, OU III, Page 19, second bullet	Update the maximum combined PFOS/PFOA detection indicated.	The text now includes the maximum combined PFOS/PFOA concentration detected of 12,440 ng/L at the Current Firehouse.
3	Section 3.2, OU III, Page 19, second bullet, second to last sentence	Suggest indicating the findings from the other two homes as not clear if above the HAL or not detected.	The text was updated to reflect that the samples from the other two homes did not detect PFOS or PFOA.

BNL Groundwater Protection Group
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Comment Number	Section	Comment	Response
4	LAG Schedule Update 2019	Include 1,4-dioxane and PFAS activities as part of the schedule.	Following the promulgation of drinking water standards for these contaminants, BNL will submit a recommendation that identifies new Areas of Concern under a new or existing Operable Unit. Following regulatory approval and the identification of appropriate funding, BNL will then submit to the regulators a proposed schedule for submittal of the Remedial Investigation (RI) and Feasibility Study Scope of Work and the RI Work Plan.
5	Figure	The Federal Facility Agreement Section X Areas of Concern indicates that a facility map is required that identifies the solid waste management units. This facility map should be included with this document as it will identify the location of the Areas of Concern indicated in the tables.	A figure that identifies the Areas of Concern is now included in this Report.